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*[Additional Counsel on Signature Page]*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

RON BERGMAN, Individually and on Behalf of  
All Others Similarly Situated,

Case No.: 4:23-cv-01742-YGR

Plaintiff,

V.

CARIBOU BIOSCIENCES, INC., RACHEL E. HAURWITZ, JASON V. O'BYRNE, RYAN FISCHESSER, SCOTT BRAUNSTEIN, ANDREW GUGGENHIME, JEFFREY LONG-MCGIE, and NATALIE R. SACKS,

#### Defendants.

**JOINT STIPULATION AND  
[PROPOSED] ORDER REGARDING  
CASE SCHEDULE**

**Judge:** Hon. Yvonne Gonzalez Rogers  
**Courtroom:** 1 – 4<sup>th</sup> Floor

1 Lead Plaintiff Ron Bergman (“Plaintiff”) and Defendants Caribou Biosciences, Inc., Rachel  
 2 E. Haurwitz, Jason V. O’Byrne, Ryan Fischesser, Scott Braunstein, Andrew Guggenheim, Jeffrey  
 3 Long-McGie, and Natalie R. Sacks (collectively, “Defendants”), by and through their respective  
 4 counsel, respectfully submit this Stipulation and [Proposed] Order setting forth a schedule for the  
 5 filing of an amended complaint, a motion to dismiss, an opposition to the motion to dismiss, and a  
 6 reply to the opposition to the motion to dismiss.

7 **WHEREAS**, on May 8, 2023, the Court entered an order directing the parties to submit a  
 8 proposed scheduling order within 14 days of appointment of lead plaintiff [Docket No. 11];

9 **WHEREAS**, on July 6, 2023, the Court entered an Order Appointing Lead Plaintiff and Lead  
 10 Counsel [Docket No. 26];

11 **WHEREAS**, Plaintiff presently intends to file an amended complaint;

12 **WHEREAS**, the Defendants presently intend to move to dismiss any complaint in this action;

13 **WHEREAS**, pursuant to the Private Securities Litigation Reform Act of 1995, codified at 15  
 14 U.S.C. § 77z-1 and 78u-4 (“PSLRA”), all discovery and other proceedings in this action are stayed  
 15 pending the determination of the Defendants’ planned motion to dismiss;

16 **NOW, THEREFORE**, Plaintiff and the Defendants stipulate and agree, subject to approval  
 17 of the Court, as follows:

18           1. Plaintiff shall file an amended complaint (the “AC”) within 60 days of entry of  
 19 this order;

20           2. The Defendants shall answer or otherwise respond to the AC within 45 days of  
 21 its filing;

22           3. If a motion to dismiss is filed, Plaintiff shall file any opposition within 45 days  
 23 of the filing of any motion to dismiss;

24           4. The Defendants shall file any reply within 20 days of the filing of the  
 25 opposition; and

26           5. Consistent with Federal Rule of Civil Procedure 6(a)(1)(C), if any of the  
 27 deadlines set forth above fall on a Saturday, Sunday, or a legal holiday, the filing shall be  
 28 made on the next day that is not a Saturday, Sunday, or legal holiday.

1  
2 Dated: July 17, 2023  
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6 By: /s/Laurence M. Rosen  
Laurence M. Rosen  
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15 *Co-Lead Counsel for Lead Plaintiff and for the*  
*Class*  
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Dated: July 17, 2023

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By: /s/ Jonathan A. Shapiro  
Jonathan A. Shapiro

*Counsel for Defendants Caribou Biosciences,  
Inc., Rachel E. Haurwitz, Jason V. O'Byrne,  
Ryan Fischesser, Scott Braunstein, Andrew*

*Guggenheim, Jeffrey Long-McGie, and Natalie R. Sacks*

## SIGNATURE ATTESTATION

Pursuant to Local Civil Rule 5-1(h)(3), I attest under penalty of perjury that each of the other signatories have concurred in the filing of this document.

July 17, 2023

By: /s/ Laurence M. Rosen

Laurence M. Rosen

## **IT IS SO ORDERED**

Dated: 7/19/2023

Yvonne Gonzalez Rogers  
Hon. Yvonne Gonzalez Rogers  
United States District Court Judge